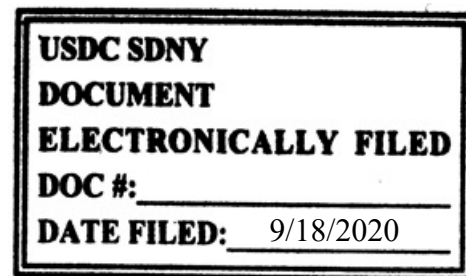


Law Offices of
ANDRE A. ROUVIERE
Merrick Park Law Center
4070 Laguna Street
Coral Gables, Florida 33146
e-mail: Andre@Rouvierelawfirm.com



André A. Rouviere
Lissette B. Cruz

Telephone (305) 774-7000
Fax (305) 946-6121

September 18, 2020

VIA ECF
Honorable Stewart D. Aaron, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rouviere v. DePuy Orthopaedics, et al.
Civil Action No. 1:18-cv-4814 (AJN)

Dear Judge Aaron,

Pursuant to the Local Rules of the Southern District of New York and this Court's procedure, below please find the Plaintiffs, Jodi Rouviere and Andre Rouviere's, Letter Request for an Extension of time to file its expert disclosure. Plaintiffs have been working diligently with an engineer toward completion of its expert report. Not until Thursday night, September 17, 2020 at 10 pm did the expert advise the Plaintiffs that he was not willing to continue as Plaintiffs expert. Plaintiffs have sought the agreement of the Defense to extend the deadline one week. Defendants have refused to an agreement.

Plaintiffs seek one additional week to secure its full complement of experts and file its Expert disclosure. Plaintiffs will be irreparably harmed if it cannot have time to locate a replacement expert.

Accordingly, Plaintiffs respectfully request this Court extend the time to respond to file its Expert Witness Disclosure by one week. This motion is not filed to cause undue delay.

LAW OFFICES OF ANDRE A. ROUVIERE
Attorneys for Plaintiffs
Merrick Park Center
4070 Laguna Street
Coral Gables, Florida 33146
Tel:(305) 774-7000

Email: andre@rouvierelawfirm.com

By: /s/Andre A. Rouviere

ANDRE A. ROUVIERE

F.B.N. 826073

cc: All Counsel of Record (*via ECF*)

ENDORSEMENT: Based upon the record currently before the Court, Plaintiffs' request is DENIED. Plaintiffs have not provided an adequate showing of cause to justify their eleventh-hour request. For example, Plaintiffs do not state when they first consulted with the "engineer" expert, when they first retained him/her and/or what work product, if any, (s)he created. SO ORDERED.

Dated: 9/18/2020

